

REMARKS/ARGUMENT

Claim 1-14 stand allowed.

Claim 15 stands rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,920,353 to Diaz et al. Applicant respectfully traverses this rejection, as set forth below.

In order that the rejection of Claim 15 be sustainable, it is fundamental that “each and every element as set forth in the claim be found, either expressly or inherently described, in a single prior art reference.” Verdegall Bros. v. Union Oil Co. of California, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). See also, Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989), where the court states, “The identical invention must be shown in as complete detail as is contained in the ... claim”.

Furthermore, “all words in a claim must be considered in judging the patentability of that claim against the prior art.” In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

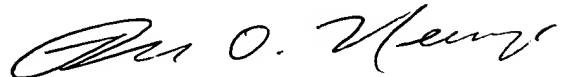
Independent Claim 15 requires and positively recites, circuitry for processing images and video, comprising: “a processor for executing a program of software instructions for processing images or video”, “a random access memory”, “a bus for coupling the processor to one **or more hardware accelerators** for performing certain video processing functions associated with ones of the software instructions” and “wherein certain software instruction can be processed by either the processor or a hardware accelerator **based on whether a hardware accelerator for processing the certain software instruction is coupled to the bus**, where the decision to process the certain software instruction in the processor is made in real-time”.

In contrast, the Diaz reference teaches an apparatus in which “how much of the operation is performed in the processor 75 is based on balancing the processing capacity and speed of the processor 75 with the complexity and amount of processing required to perform the function as specified by the standard ...” (col. 10, lines 6-10). No where does Diaz teach or suggest that its “balancing determination” is based in whole, or in part, upon whether or not its hardware accelerator is coupled to the bus. Accordingly, Diaz fails to teach or suggest, “wherein certain software instruction can be processed by either the processor or a hardware accelerator **based on whether a hardware accelerator for processing the certain software instruction is coupled to the bus,** where the decision to process the certain software instruction in the processor is made in real-time”, as required by Claim 15.

Further more, Diaz fails to teach or suggest more than one hardware accelerators for performing certain video processing functions associated with ones of the software instructions. As a result, Diaz further fails to teach or suggest, “a bus for coupling the processor to one **or more hardware accelerators** for performing certain video processing functions associated with ones of the software instructions”, as further required by Claim 15.

Claims 1-14 stand allowed. Claim 15 stands allowable over the references of record. Applicant respectfully requests allowance of the application as the earliest possible date.

Respectfully submitted,



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